

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

JORGE RAY CORONA,

Plaintiff,

v.

No. 17-CV-00805-MCA-CG

CITY OF CLOVIS, CLOVIS POLICE
DEPARTMENT, OFFICER BRENT AGUILAR,
AND OFFICER TRAVIS LOOMIS, IN THEIR
PERSONAL AND OFFICIAL CAPACITIES,

Defendants.

**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION TO PREVENT
DEFENDANT AGUILAR FROM LEAVING THE UNITED STATES**

Plaintiff, by and through counsel of Record, Lindsey Law Firm, L.L.C., by Daniel R. Lindsey, hereby submit their Motion for Preliminary Injunction to Prevent Defendant Aguilar From Leaving the United States as follows:

1. It has come to the attention of Plaintiff that Defendant Police Officer Brent Aguilar has plans to leave the United States for a period of time of at least one year, commencing within the next several weeks.

2. Plaintiff's counsel has left messages on two occasions with counsel for Defendant Aguilar inquiring with respect to his availability to participate in discovery and trial related to this cause. However, counsel for Defendant has not responded to Plaintiff's counsels requests for the status of Defendant Aguilar.

3. The subject case is of major importance to the citizens of Clovis and the Clovis Police Department due to the fact that Defendant Aguilar is facing charges of brutality and violating the civil rights of a citizen protected by the Constitution of the United States.

4. The Court should issue a Preliminary Injunction to prevent Defendant Brent Aguilar from leaving the United States to avoid participation in the trial of this matter.

WHEREFORE, Plaintiff requests that this Court issue its Preliminary Injunction confiscating the passport of Defendant Brent Aguilar and prohibiting his leaving the United States during the pendency of this cause.

Respectfully Submitted,
LINDSEY LAW FIRM, LLC

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